

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

MICHAEL P. AND SHELLIE GILMOR,  
et al.,

Plaintiffs,

vs.

PREFERRED CREDIT CORPORATION,  
et al.,

Defendants.

Case No. 10-0189-CV-W-ODS

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE  
TO FILE SUGGESTIONS IN OPPOSITION  
IN EXCESS OF PAGE LIMITS ALLOWED BY LOCAL RULE**

Plaintiffs respectfully move the Court for an Order permitting them to file their Suggestions in Opposition to the *Daubert Motion of Defendants Litton Loan Servicing, L.P. and JPMorgan Chase Bank, National Association, as Former Trustee, to Exclude Expert Testimony* ("Litton/JPMCB") of up to twenty-five (25) pages in length. In support of this Unopposed Motion, Plaintiffs state as follows:

**SUGGESTIONS IN SUPPORT**

1. Plaintiffs are set to file their Suggestions in Opposition to Litton/JPMCB's *Daubert Motion* by the current deadline of September 27, 2012.
2. Given the complexity of the issues and the arguments to be raised by Plaintiffs in their suggestions in opposition, Plaintiffs will need more than the 15 pages permitted by Local Rule 7.0(f) to adequately respond to the arguments raised in Litton/JPMCB's.

3. Plaintiffs submit that good cause exists for this request in that it is necessary for Plaintiffs to exceed the 15-page limit for suggestions in opposition to respond to Litton/JPMCB's *Daubert Motion* and the arguments raised therein.

4. The excess pages requested by Plaintiffs will not cause any hardship or prejudice to any party.

5. Plaintiffs have conferred with counsel for Litton/JPMCB regarding the requested excess pages and have been informed that they do not oppose the instant request for excess pages.

6. This request has been made in good faith and is necessary for Plaintiffs to complete their suggestions in opposition.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order permitting them to file their Suggestions in Opposition to the *Daubert Motion of Defendants Litton Loan Servicing, L.P. and JPMorgan Chase Bank, National Association, as Former Trustee, to Exclude Expert Testimony* of up to twenty-five (25) pages in length and for any other relief the Court deems just and proper.

Dated: September 27, 2012

Respectfully submitted,

WALTERS BENDER STROHBEHN  
& VAUGHAN, P.C.

By: /s/ R. Frederick Walters

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**ATTORNEYS FOR PLAINTIFFS  
AND CLASS COUNSEL**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this the 27<sup>th</sup> day of September 2012, I electronically filed the above and foregoing document with the Clerk of Court of the Western District of Missouri using the Court's ECF system, which will send notification of said filing to all counsel of record who are ECF participants. In addition, a copy was served by U.S. mail, First-Class Postage Prepaid, to:

Arthur E. Kechijian, Manager  
United Mortgage C.B., LLC  
P.O. Box 471827  
Charlotte, NC 28247  
**Defendant United Mortgage C.B., L.L.C.**

/s/ R. Frederick Walters